OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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Operator: PEOPLES GAS LIGHT AND COKE CO.	Operator ID#: 15329
Inspection Date(s): 10/1/2014, 9/29/2014, 9/30/2014	Man Days: 3
Inspection Unit: Manlove	
Location of Audit: Fisher	
Exit Meeting Contact: Charles Sikora	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Aaron McElravy	
Company Representative to Receive Report: Tom Webb **Company Representative's Email Address: TJWebb@peoplesgasdelivery.com**	

Headquarters Address Information:	200 E. Randolph Street Chicago, IL 60601 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Jodi Caro Phone#: (000) 000-0000 Email:	John Kleczynski Phone#: (000) 000-0000 Email: jdkleczynski@integrysgroup.com
Inspection Contact(s)	**Title**	**Phone No.**
Charles Sikora	Compliance Gas Storage	(217) 897-7123
Thomas Puracchio	Manager Gas Storage	(217) 897-7120
Eddie Morrow	Senior Engineer Compliance	(312) 240-4360

REPORTING PROCEDURES		**Status**
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	**Satisfactory**
General Comment: *The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.*		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	**Satisfactory**
General Comment:		

The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.

[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	**Satisfactory**

General Comment:

The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.

[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	**Satisfactory**

General Comment:

The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.

[192.605(b) (4)][191.15(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	**Satisfactory**

General Comment:

The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.

[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	**Satisfactory**

General Comment:

The procedures for notification and filing of safety related conditions including examples of conditions to be reported are located in Exhibit 7 of the Emergency Plan Section 5, G Pages 20-22. Procedures are also included in the Manlove O&M Exhibit 14 Section 4, Pages 56-58.

[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	**Satisfactory**

General Comment:

The procedures for notification and filing of safety related conditions including examples of conditions to be reported are located in Exhibit 7 of the Emergency Plan Section 5, G Pages 20-22. Procedures are also included in the Manlove O&M Exhibit 14 Section 4, Pages 56-58.

[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	**Satisfactory**

General Comment:

The procedures for reporting accidents or damages to the ICC are located in Exhibit 7 of the Emergency Plan Section 5, B Pages 5-7.

CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES		**Status**
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	**Not Checked**

General Comment:

Manlove storage does not contain customer owned service lines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.381]	Does the operator's procedure require that when EFVs are installed on single family residents that shall at a minimum meet the performance requirements of §192.381?	**Not Checked**

General Comment:

Manlove gas storage facility contains transmission pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

INSTALLATION OF TRANSMISSION & DISTRIBUTION MAIN PIPE		Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	**Satisfactory**

General Comment:

The procedure for backfilling the pipeline to prevent damage is located in Exhibit 13, G Page 23.

[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	**Not Checked**

General Comment:

Manlove gas storage does not install plastic pipe. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	**Satisfactory**

General Comment:

The casing design requirements are located in Exhibit 13, Section IV Pages 24-32.

[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	**Satisfactory**

General Comment:

The procedure for underground clearance in accordance with 192.325 is located in the Manlove O&M Exhibit 14, Section 7.3.4, B Page 85

[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	**Satisfactory**

General Comment:

The procedures for cover requirements are located in the Manlove O&M Exhibit 14, Section 7.3.4 C Page 85.

[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	**Not Checked**

General Comment:

Manlove gas storage does not install plastic pipe. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

SERVICE LINE INSTALLATION	Status

Category Comment:

Manlove gas storage facility contains transmission pipelines and does not install service lines. The distribution O&M review was completed at Tech Training on

January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	**Not Checked**
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	**Not Checked**
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	**Not Checked**
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	**Not Checked**
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	**Not Checked**
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	**Not Checked**
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	**Not Checked**
CUSTOMER METERS AND REGULATORS		**Status**

Category Comment:

Manlove gas storage facility does not install customer meters, the facility operates transmission pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	**Not Checked**
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	**Not Checked**
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	**Not Checked**
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	**Not Checked**
NORMAL OPERATING AND MAINTENANCE PROCEDURES		**Status**
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	**Satisfactory**

General Comment:

The procedure is located in the Manlove O&M Exhibit 14, 1.3.4 Page 7.

Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?	**No**

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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General Comment: *Peoples Gas maintains a separate OQ and Training Plan.*		
Do procedures clearly include the name of the reviewer and dates of reviews?		**Not Checked**
General Comment: *Integrys does a system wide and legacy procedure review the procedures are located in Integrys Manual Section 1520, these records are reviewed during the Record Audit.*		
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	**Satisfactory**
General Comment: *The procedure for the availability of records, maps and operating history is located in the Manlove O&M Exhibit 14, Section 2.3.3 A Page 42.*		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	**Satisfactory**
General Comment: *The procedure for start up and shut down within the MAOP is located in Exhibit 14, Section M Page 29.*		
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	**Satisfactory**
General Comment: *The procedure for the periodic adequacy review is located in the Manlove O&M Exhibit 14, Section 2.3.6 A Page 54.*		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	**Satisfactory**
General Comment: *The procedures for excavation and trenching precautions are located in the Manlove O&M Exhibit 14, Section 7.3.6 Pages 89-93.*		
ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION		**Status**
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	**Satisfactory**
General Comment:		

The procedure for investigating the unintended closure of valves is located in Exhibit 7, Section 4.2 Page 5.

[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	**Satisfactory**

General Comment:

The procedures for responding to abnormal operating conditions is located in Exhibit 13, H Pages 10-11.

[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	**Satisfactory**

General Comment:

The procedures for responding to abnormal operating conditions is located in Exhibit 13, H Pages 10-11.

[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	**Satisfactory**

General Comment:

The procedures for responding to abnormal operating conditions is located in Exhibit 13, H Pages 10-11.

[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	**Satisfactory**

General Comment:

The procedures for responding to abnormal operating conditions is located in Exhibit 13, H Pages 10-11.

[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	**Satisfactory**

General Comment:

The procedures for responding to abnormal operating conditions is located in Exhibit 13, H Pages 10-11.

[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	**Satisfactory**

General Comment:

The notification for operating personnel is located in Exhibit 7, Section 4.2 Pages 1-10.

[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	**Satisfactory**

General Comment:

The procedure for Procedure adequacy review is located in the Manlove O&M Exhibit 14, Section 6.3.5 Page 81and Attachment B.

CHANGE IN CLASS LOCATION PROCEDURES		Status
[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	**Satisfactory**

General Comment:

The procedure requiring class location surveys is located in the Manlove O&M Exhibit 14, G Page 25.

[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	**Satisfactory**

General Comment:

The procedure to confirm or revise the MAOP is located in Manlove O&M Exhibit 14, H Page 25.

CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	**Satisfactory**

General Comment:

The procedures for continuing surveillance are located in the Manlove O&M Exhibit 14, Section 2.3.1 I Page 26.

[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	**Satisfactory**

General Comment:

The procedures for continuing surveillance are located in the Manlove O&M Exhibit 14, Section 2.3.1 I Page 26.

[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	**Not Checked**

General Comment:

Manlove gas storage facility does not contain cast iron pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.613(a)][192.489]	Does the operator’s procedure include requirements for surveillance of cast iron pipelines, including	**Not Checked**

	appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating maintenance conditions?	

General Comment:

Manlove gas storage facility does not contain cast iron pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

DAMAGE PREVENTION PROGRAM PROCEDURES		Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- identifies persons who engage in excavating?	**Satisfactory**

General Comment:

The damage prevention and one-call procedures are located in the Manlove O&M Exhibit 14, I Page 26 which references the O&M for the Transmission Outside the City of Chicago Exhibit 13 I Pages 56-60.

[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification to the public in the One Call area?	**Satisfactory**

General Comment:

The damage prevention and one-call procedures are located in the Manlove O&M Exhibit 14, I Page 26 which references the O&M for the Transmission Outside the City of Chicago Exhibit 13 I Pages 56-60.

[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means for receiving and recording notifications of pending excavations?	**Satisfactory**

General Comment:

The damage prevention and one-call procedures are located in the Manlove O&M Exhibit 14, I Page 26 which references the O&M for the Transmission Outside the City of Chicago Exhibit 13 I Pages 56-60.

[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification of pending excavations to the members?	**Satisfactory**

General Comment:

The damage prevention and one-call procedures are located in the Manlove O&M Exhibit 14, I Page 26 which references the O&M for the Transmission Outside the City of Chicago Exhibit 13 I Pages 56-60.

[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means of temporary marking for the pipeline in the vicinity of the excavations?	**Satisfactory**

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General Comment: *The damage prevention and one-call procedures are located in the Manlove O&M Exhibit 14, I Page 26 which references the O&M for the Transmission Outside the City of Chicago Exhibit 13 I Pages 56-60.*		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	**Satisfactory**
General Comment: *The procedure is located in Exhibit 9, Section 8 Page 9.*		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	**Satisfactory**
General Comment: *The procedures are located in Exhibit 13, I Page 266.*		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		**No**
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		**Yes**
General Comment: *Manlove O&M references Exhibit 1, General Order 6.000 Page 3.*		
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	**Satisfactory**
General Comment: *The procedures are located in Exhibit 7 Page 7 of the Emergency Operating Plan.*		
EMERGENCY PROCEDURES		**Status**
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	**Satisfactory**
General Comment: *The Manlove disaster and Emergency Plan references Peoples Emergency Operating Plan Section IV, 2.Gm which contains procedures for restoring service.*		
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events, such as,	**Satisfactory**

	gas odor inside or near a building?	
General Comment: *The procedures for plant emergencies including events such as odor inside or near a buildings are located in the Manlove field and disaster action plan Section 4, A Pages 1-9.*		
[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?	**Satisfactory**
General Comment: *The procedures for maintaining liaison during an emergency is located in the Manlove Field Disaster and Emergency Action Plan Section 3, B Pages 1-2.*		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	**Satisfactory**
General Comment: *The procedures for field and compressor stations emergencies are located in the Manlove Field Disaster and Emergency Action Plan Section 4 Pages 1-9 and Section 5, Page 1 and includes gas leaks, fires, explosions and natural disasters.*		
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	**Satisfactory**
General Comment: *The procedures for field and compressor stations emergencies are located in the Manlove Field Disaster and Emergency Action Plan Section 4 Pages 1-9 and Section 5, Page 1 and includes gas leaks, fires, explosions and natural disasters.*		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	**Satisfactory**
General Comment: *The procedures for field and compressor stations emergencies are located in the Manlove Field Disaster and Emergency Action Plan Section 4 Pages 1-9 and Section 5, Page 1 and includes gas leaks, fires, explosions and natural disasters.*		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	**Satisfactory**
General Comment: *The procedures for field and compressor stations emergencies are located in the Manlove Field Disaster and Emergency Action Plan Section 4 Pages 1-9 and Section 5, Page 1 and includes gas leaks, fires, explosions and natural disasters.*		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	**Satisfactory**
General Comment: *The procedure located in the Manlove Disaster and Emergency Action Plan Section 3 Page 1 contains company command during an emergency and designates responsible parties to ensure tools, equipment and supplies are available.*		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	**Satisfactory**
General Comment: *Peoples Emergency Operating Plan contains the procedure for protecting people first then property located in Exhibit 7, Section 4 F Page 4.*		

[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	**Satisfactory**
General Comment: *The procedures for isolation including compressor stations and isolation valves are located in the Manlove Field and Disaster and Emergency Action Plan Section 8 Pages 1-5.*		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	**Satisfactory**
General Comment: *The procedures for emergency command and control are located in the Manlove Field Disaster and Emergency Action Plan located in Section 3 Pages 1-3. The procedure includes action to make safe any potential or actual emergency and maintain liaison with public officials regarding the emergency.*		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	**Satisfactory**
General Comment: *The procedures for emergency command and control are located in the Manlove Field Disaster and Emergency Action Plan located in Section 3 Pages 1-3. The procedure includes action to make safe any potential or actual emergency and maintain liaison with public officials regarding the emergency.*		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	**Satisfactory**
General Comment: *The procedure for follow up activities as soon as possible after an emergency are located in Peoples Emergency Operating Plan Section 2, Page 2.*		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	**Satisfactory**
General Comment: *The procedure for providing copies of the Plan are located in Exhibit XIV Section 1, Page 1.*		
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	**Satisfactory**
General Comment: *The procedures for training and review are located in the Emergency Operating Plan Exhibit 7, Section 9 B Page 1.*		
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	**Satisfactory**
General Comment:		

The procedures for training and review are located in the Emergency Operating Plan Exhibit 7, Section 9 B Page 1.

[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	**Satisfactory**

General Comment:

The procedures for establishing and maintaining liaison with public officials are located in the Emergency Operating Plan Exhibit 7, Section 3 Page 2.

Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?	**Yes**

General Comment:

The procedures for the possibility of additional leaks are located in the Emergency Operating Plan Exhibit 7, Section 4-2 G Pages 5-7.

FAILURE INVESTIGATION PROCEDURES		**Status**
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	**Satisfactory**

General Comment:

The procedures for failure investigation are located in the Emergency Operating Plan Exhibit 7, Attachment B Page 1.

MAOP PROCEDURES		**Status**
[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	**Satisfactory**

General Comment:

The procedures for establishing the MAOP are located in the Manlove O&M Exhibit Pages 29-30.

[192.605(a)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	**Not Checked**

General Comment:

Peoples Gas does not operate low pressure piping at this location. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	**Satisfactory**

General Comment:

Test.

[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	**Satisfactory**

General Comment:

The procedures establishing the MAOP are located in the Manlove O&M Exhibit 14 Page 86.		
[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	**Not Applicable**
General Comment: *The MAOP of the storage field and pipeline was not determined by this requirement. They do not utilize this method to determine the MAOP. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	**Satisfactory**
General Comment: *The procedures for establishing the MAOP are located in the Manlove O&M Exhibit Pages 29-30.*		
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	**Satisfactory**
General Comment: *The procedure requiring overpressure protection is located in Exhibit 14 Page 30.*		
[192.605(b) (5)]	Does the operator have procedures for start up and shut down within MAOP of the pipeline?	**Satisfactory**
General Comment: *The procedure for start up and shut down within the MAOP is located in Exhibit 14, Section M Page 29.*		
Does the operator install pipelines to operate under alternative MAOP requirements?		**No**
General Comment: *The alternative method to establish MAOP in accordance with 192. 620 is not used by Peoples Gas.*		
[192.605(a)][192.620(b) (4)]	If yes, does the operator have procedures to require the additional construction requirements included under 192.328?	**Not Applicable**
General Comment: *The alternative method to establish MAOP in accordance with 192. 620 is not used by Peoples Gas.*		
[192.605(a)][192.328(b)]	If yes, does the operator have procedures requiring all girth welds to be non-destructively tested in accordance with 192.243 (b) and (c)?	**Not Applicable**
General Comment: *The alternative method to establish MAOP in accordance with 192. 620 is not used by Peoples Gas.*		
PRESSURE TEST PROCEDURES		**Status**
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	**Satisfactory**

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General Comment: *The procedures for pre-testing components are located in the Manlove O&M Exhibit 14, A Page 87.*		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	**Satisfactory**
General Comment: *The procedures for testing relocated or replaced sections of pipe are located in the Manlove O&M Exhibit 14, 7.3.5, A Page 87.*		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	**Satisfactory**
General Comment: *The procedure to ensure all hazardous leaks have been eliminated is located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	**Satisfactory**
General Comment: *The procedure which specifies test medium is located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	**Satisfactory**
General Comment: *The procedures requiring each non-welded joint be tested at not less than operating pressure are located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	**Satisfactory**
General Comment: *The testing procedures are located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's	**Satisfactory**

	procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	
General Comment: *The testing procedures are located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	**Satisfactory**
General Comment: *The testing procedures are located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	**Satisfactory**
General Comment: *The testing procedures are located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	**Satisfactory**
General Comment: *The testing procedures are located in the Manlove O&M Exhibit 14, 7.3.5 Pages 85-88.*		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	**Not Checked**
General Comment: *The Manlove gas storage facility does not contain plastic pipelines or operating pressure below 100psig. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	**Not Checked**
General Comment:		

All pipelines in the storage field have an MAOP of 2000psig and do not contain plastic pipe or service lines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	**Not Checked**

General Comment:

All pipelines in the storage field have an MAOP of 2000psig and do not contain plastic pipe or service lines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.513(b)]	Does the operator's procedure insure discovery of all potentially hazardous leaks in the segment being tested?	**Not Checked**

General Comment:

All pipelines in the storage field have an MAOP of 2000psig and do not contain plastic pipe. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	**Not Checked**

General Comment:

All pipelines in the storage field have an MAOP of 2000psig and do not contain plastic pipe. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[191.13(c)][192.513(d)]	Does the operator's procedures require that when testing thermoplastic material the temperature may not be more than 100 F or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater?	**Not Checked**

General Comment:

All pipelines in the storage field have an MAOP of 2000psig and do not contain plastic pipe. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	**Satisfactory**

General Comment:

The procedure for the retention of pressure testing records is located in the Manlove O&M Exhibit 14 Page 88 and includes the name of the company, person in charge of the test, test medium, test pressures, charts, duration and leaks and failures noted.

[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	**Satisfactory**

General Comment:

The procedure for the retention of pressure testing records is located in the Manlove O&M Exhibit 14 Page 88 and includes the name of the company, person in charge of the test, test medium, test pressures, charts, duration and leaks and failures noted.

[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	**Satisfactory**
General Comment: *The procedure for the retention of pressure testing records is located in the Manlove O&M Exhibit 14 Page 88 and includes the name of the company, person in charge of the test, test medium, test pressures, charts, duration and leaks and failures noted.*		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	**Satisfactory**
General Comment: *The procedure for the retention of pressure testing records is located in the Manlove O&M Exhibit 14 Page 88 and includes the name of the company, person in charge of the test, test medium, test pressures, charts, duration and leaks and failures noted.*		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	**Satisfactory**
General Comment: *The procedure for the retention of pressure testing records is located in the Manlove O&M Exhibit 14 Page 88 and includes the name of the company, person in charge of the test, test medium, test pressures, charts, duration and leaks and failures noted.*		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	**Satisfactory**
General Comment: *The procedure for the retention of pressure testing records is located in the Manlove O&M Exhibit 14 Page 88 and includes the name of the company, person in charge of the test, test medium, test pressures, charts, duration and leaks and failures noted.*		
ODORIZATION of GAS PROCEDURES		**Status**
[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	**Satisfactory**
General Comment: *The statement requiring all distribution gas be odorized is located in the Manlove O&M Exhibit 14 Page 30.*		
[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	**Not Applicable**
General Comment: *The Gas from the storage field is not odorized and is not in a Class 3 or 4 location. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	**Not Applicable**
General Comment: *The Gas from the storage field is not odorized and is not in a Class 3 or 4 location. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
TAPPING PIPELINES UNDER PRESSURE PROCEDURES		**Status**
[192.627][192.627]	Does the plan provide for adequate tapping	**Satisfactory**

	procedures for pipelines under pressure?	
General Comment: *The Manlove O&M references Exhibit 13 which contains the procedures for hot taps located in Section L Pages 192-200.*		
[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	**Satisfactory**
General Comment: *The Manlove O&M references Exhibit 13 which contains the procedures for hot taps located in Section L Pages 192-200.*		
PIPELINE PURGING PROCEDURES		**Status**
[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	**Satisfactory**
General Comment: *The procedures for purging using air, nitrogen and natural gas are located in the Manlove O&M Exhibit 14, Appendix F Pages 168-176.*		
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	**Satisfactory**
General Comment: *The procedures for purging using air, nitrogen and natural gas are located in the Manlove O&M Exhibit 14, Appendix F Pages 168-176.*		
MAINTENANCE PROCEDURES		**Status**
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	**Satisfactory**
General Comment: *The procedure for leaks and repairs is located in Exhibit 13, I Pages 170-172.*		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	**Satisfactory**
General Comment: *The procedure for hazardous leaks is located in Exhibit 13, I Page 170.*		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		**Status**
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	**Satisfactory**
General Comment:		

The procedure for patrols are located in the Manlove O&M Exhibit 14, Section 6.3.2, B, 4. Page 69.

[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	**Satisfactory**

General Comment:

The procedure for patrols are located in the Manlove O&M Exhibit 14, Section 6.3.2, B, 4. Page 69.

[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	**Satisfactory**

General Comment:

The procedure for leakage surveys conducted at the storage field and pipelines is located in the Manlove O&M Exhibit 14, Section 6.3.2 C Page 70-71.

[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	**Not Checked**

General Comment:

Manlove gas storage and transmission pipeline is located in a class 1 & 2. These procedures are reviewed during the audit of the transmission system located outside the City of Chicago.

[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	**Not Checked**

General Comment:

Manlove storage and transmission pipeline is located in a class 1 & 2. These procedures are reviewed during the audit of the transmission system located outside the City of Chicago.

DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status

Category Comment:

Manlove gas storage is considered a transmission facility. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	**Not Checked**
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	**Not Checked**
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical	**Not Checked**

	movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	**Not Checked**
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	**Not Checked**
LINE MARKER PROCEDURES		**Status**
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	**Satisfactory**
General Comment: *The O&M for Manlove references Exhibit 13, Section V K Pages 267-274.*		
TRANSMISSION RECORD KEEPING PROCEDURES		**Status**
Category Comment: *The record requirements are located in the Manlove O&M Exhibit 14, Section 6.3.2 E Page 70.*		
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	**Satisfactory**
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to “other than pipe” for 5 years?	**Satisfactory**
[192.605(b)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	**Satisfactory**
TRANSMISSION FIELD REPAIR PROCEDURES		**Status**
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe;	**Satisfactory**

	OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	**Satisfactory**

General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	**Satisfactory**

General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	**Satisfactory**
General Comment: *The procedures for field repair of transmission leaks and defects are located in Exhibit 13, Section I Pages 170-178.*		
TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		**Status**
Category Comment: *Manlove gas storage contains transmission pipelines and does not contain service lines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	**Not Checked**

[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	**Not Checked**
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		**Status**
[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	**Satisfactory**
General Comment: *The procedure for the abandonment of pipelines is located in Exhibit 13, Section III Pages 223-226.*		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	**Satisfactory**
General Comment: *The procedure for the abandonment of pipelines is located in Exhibit 13, Section III Pages 223-226.*		
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	**Not Checked**
General Comment: *Manlove is a storage facility and does not contain distribution piping. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	**Not Checked**
General Comment: *Manlove is a storage facility and does not contain distribution piping. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	**Not Checked**
General Comment: *Manlove is a storage facility and does not contain distribution piping. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		

[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	**Satisfactory**
General Comment: *The procedure for purging the pipeline is located in Exhibit 13, Section 3 Page 217.*		
[192.605(b)][192.727(f)]	Does the operator's procedure require that each abandoned vault be filled with a suitable compacted material?	**Not Checked**
General Comment: *Manlove gas storage does not contain vaults meeting this requirement. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	**Satisfactory**
COMPRESSOR STATION PROCEDURES		**Status**
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	**Satisfactory**
General Comment: *The procedure for purging pipelines is located in Exhibit 13, Section III Pages 217-223.*		
[192.605(b)(7)][192.605(b)(7)]	Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?	**Satisfactory**
General Comment: *The procedure to ensure the MAOP is not exceeded during start or stop or compressor units is located in the Manlove O&M Exhibit 14, Section 2.3.4 Pages 29-30.*		
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	**Satisfactory**
General Comment: *The procedures for testing, repair and replacement requirements are located in the Manlove O&M Exhibit 14, Section 6.3.3 B Pages 77-78.*		
[192.605(b) (7)][192.731(b)]	Does the operator's procedure require when any defective or inadequate relief device is found that it must be promptly repaired or replaced?	**Satisfactory**
General Comment: *The procedures for testing, repair and replacement requirements are located in the Manlove O&M Exhibit 14, Section 6.3.3 B Pages 77-78.*		

[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	**Satisfactory**
General Comment: *The procedure for the storage of combustible materials is located in the Manlove O&M Exhibit 14, Section 6.3.3 C Page 78.*		
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	**Satisfactory**
General Comment: *The procedure for the storage of combustible materials is located in the Manlove O&M Exhibit 14, Section 6.3.3 C Page 78.*		
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	**Satisfactory**
General Comment: *The procedures for gas detection are located in the Manlove O&M Exhibit 14, Section 6.3.3 D Pages 78-79.*		
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	**Satisfactory**
General Comment: *The procedures for gas detection are located in the Manlove O&M Exhibit 14, Section 6.3.3 D Pages 78-79.*		
PRESSURE LIMITING and REGULATING STATION PROCEDURES		**Status**
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	**Satisfactory**
General Comment: *The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2 H & I Page 71.*		
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	**Satisfactory**
General Comment:		

The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2 H & I Page 71.

[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	**Satisfactory**

General Comment:

The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2 H & I Page 71.

[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	**Satisfactory**

General Comment:

The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2 H & I Page 71.

[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	**Not Checked**

General Comment:

The MAOP is determined by construction test pressures. The storage field does not use 192.619(c) to determine the MAOP. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	**Not Checked**

General Comment:

Manlove storage does not contain telemetering or recording gauges.

[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	**Not Checked**

General Comment:

Manlove storage does not contain telemetering or recording gauges. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	**Not Checked**

General Comment:

Manlove storage does not contain telemetering or recording gauges. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	**Satisfactory**

General Comment:

The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2, I Page 71 and Section 2.3.1 F Pages 24-25.

[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	**Satisfactory**

General Comment:

The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2, I Page 71 and Section 2.3.1 F Pages 24-25.

[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	**Satisfactory**

General Comment:

The procedure is located in the Manlove O&M Exhibit 14, Section 6.3.2 I Page 71.

VALVE AND VAULT MAINTENANCE PROCEDURES		**Status**
[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	**Not Checked**

General Comment:

Manlove gas storage does not contain emergency transmission valves used for isolation. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	**Not Checked**

General Comment:

Manlove gas storage does not contain emergency transmission valves used for isolation. These procedures are contained in Peoples Transmission O&M.

[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	**Not Checked**

General Comment:

Manlove gas storage does not operate distribution pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	**Not Checked**
General Comment: *Manlove gas storage does not operate distribution pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	**Not Checked**
General Comment: *Manlove gas storage does not contain vaults meeting this requirement. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.179(a)]	Does the operator's procedure specify the minimum spacing requirements for transmission sectionalizing block valves?	**Not Checked**
General Comment: *Manlove storage does not contain main line valves used for isolation. These procedures are contained in Peoples Transmission O&M.*		
[192.605(b)][192.179(c)]	Does the operator's procedure require between each transmission main line valve to have a blowdown valve with enough capacity to allow for as rapid blow down as practicable?	**Not Checked**
General Comment: *Manlove gas storage does not contain main line valves used for isolation. These procedure are contained in the Transmission O&M.*		
PREVENTION of ACCIDENTAL IGNITION PROCEDURES		**Status**
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	**Satisfactory**
General Comment: *The procedure for the prevention of accidental ignition is located in the O&M Exhibit 14, Section 6.3.2, K and 7.3.6 Page 90.*		
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	**Satisfactory**
General Comment: *The procedure for the prevention of accidental ignition is located in the O&M Exhibit 14, Section 6.3.2, K and 7.3.6 Page 90.*		
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	**Satisfactory**

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

General Comment:

The procedure for the prevention of accidental ignition is located in the O&M Exhibit 14, Section 6.3.2, K and 7.3.6 Page 90.

CAULKED BELL AND SPIGOT JOINTS PROCEDURES		Status
Category Comment: *Manlove gas storage facility does not contain cast iron pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	**Not Checked**
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	**Not Checked**

PROTECTING CAST-IRON PIPELINE PROCEDURES		Status
Category Comment: *Manlove gas storage facility does not contain cast iron pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	**Not Checked**
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	**Not Checked**
[192.605(b)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	**Not Checked**
[192.605(b)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	**Not Checked**
[192.605(b)][192.755(a)(5)]	Does the operator's procedure require that when the	**Not Checked**

	operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	
[192.605(b)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	**Not Checked**
WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES		**Status**
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	**Satisfactory**
General Comment: *The procedure requiring qualification under API 1104 is located in Exhibit 8, Section 4 203.1 Page 2.*		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	**Satisfactory**
General Comment: *The procedure requiring each welding procedure be recorded in detail is located in Exhibit 8, Section 4 203.2 Page 2.*		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code?	**Satisfactory**
General Comment: *The procedure for welder qualification in accordance with API 1104 is located in Exhibit 8, Appendix 1 Page 2.*		
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	**Not Applicable**
General Comment: *Peoples Gas does not use Appendix C to qualify welders.*		
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	**Satisfactory**
General Comment: *The procedure requiring non-destructive testing for a welder to conduct welding on compressor station piping is located in Exhibit 8, Section 4 206.1.1.1 Page 14.*		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	**Satisfactory**
General Comment:		

The procedure for requalification is located in Exhibit 8, Section 4 206 Page 14.

[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at> 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	**Satisfactory**

General Comment:

The procedure for welder qualification in accordance with API 1104 is located in Exhibit 8, Appendix 1 Page 2.

[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	**Satisfactory**

General Comment:

The procedure for welder qualification in accordance with API 1104 is located in Exhibit 8, Appendix 1 Page 2.

[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	**Not Applicable**

General Comment:

Peoples Gas does not qualify welders under Appendix C.

[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	**Not Applicable**

General Comment:

Peoples Gas does not qualify welders under Appendix C.

[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	**Satisfactory**

General Comment:

The procedures that address weather conditions are located in Exhibit 8, Appendix 3 Page 3.

[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	**Satisfactory**

General Comment:

Exhibit 8, Appendix 3 Page 5 prohibits miter welds.

[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	**Satisfactory**

General Comment:

The procedures for joint alignment are located in Exhibit 8, Appendix 3 Page 5.

[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	**Satisfactory**

General Comment:

The procedure for inspection personnel is located in Exhibit 8, Section 4 211.3 Page 19.

[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	**Satisfactory**

General Comment:

The procedures for production weld inspection is located in Exhibit 8, Section 4 211 Page 19.

[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	**Satisfactory**

General Comment:

The procedure requiring 100% of welds to be radiographed is located in Exhibit 13 Page 188 and 237.

[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	**Satisfactory**

General Comment:

The procedure requiring 100% of welds to be radiographed is located in Exhibit 13 Page 188 and 237.

[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	**Satisfactory**

General Comment:

The procedure requiring 100% of welds to be radiographed is located in Exhibit 13 Page 188 and 237.

[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	**Satisfactory**

General Comment: *The procedure requiring 100% of welds to be radiographed is located in Exhibit 13 Page 188 and 237.*		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	**Satisfactory**
General Comment: *The repair methods are located in Exhibit 13, Section I, D 2 Page 173.*		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	**Satisfactory**
General Comment: *The written procedure for crack repairs are located in Exhibit 13, Section I, C Pages 171-173.*		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		**No**
TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES		**Status**
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	**Satisfactory**
General Comment: *The procedure prohibiting the use of trepanning is located in Exhibit 8, Section 211.3 Page 19.*		
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	**Satisfactory**
General Comment: *The procedure requiring detailed procedures is located in Exhibit 8, Section 601.2 Page 1.*		
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	**Satisfactory**
General Comment: *The procedure for ultrasonic testing personnel is located in Exhibit 8, Section 13 604.3 Page 8.*		
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under	**Satisfactory**

	§192.241(c)?	
General Comment: *The procedures for the interpretation of radiography is located in Exhibit 8, Section 13, 601.7.*		
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	**Satisfactory**
General Comment: *Peoples Gas does not utilize the exception allowed by 192.241. All transmission pipelines are 100% NDT tested.*		
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	**Satisfactory**
General Comment: *Peoples Gas does not utilize the exception allowed by 192.241. All transmission pipelines are 100% NDT tested.*		
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	**Satisfactory**
General Comment: *Peoples Gas does not utilize the exception allowed by 192.241. All transmission pipelines are 100% NDT tested.*		
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	**Satisfactory**
General Comment: *Peoples Gas does not utilize the exception allowed by 192.241. All transmission pipelines are 100% NDT tested.*		
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample	**Satisfactory**

	of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	
General Comment: *Peoples Gas does not utilize the exception allowed by 192.241. All transmission pipelines are 100% NDT tested.*		
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	**Satisfactory**
JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES		**Status**
Category Comment: *Manlove gas storage does not contain plastic pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.*		
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	**Not Checked**
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	**Not Checked**
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	**Not Checked**
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	**Not Checked**
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	**Not Checked**
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	**Not Checked**
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	**Not Checked**
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	**Not Checked**
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	**Not Checked**

[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	**Not Checked**
CORROSION CONTROL PROCEDURES		**Status**
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	**Satisfactory**
General Comment: *The procedures requiring the corrosion control procedures are carried out under the direction of a qualified person in corrosion control methods are located in the Manlove O&M Exhibit 14, Section 2.3.2 B Page 38.*		
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	**Satisfactory**
General Comment: *The O&M references Peoples Corrosion Control Policy Exhibit 10. The procedure is located in Exhibit 10, Section 1 Page 3.*		
[192.605(b)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	**Satisfactory**
General Comment: *The O&M references Peoples Corrosion Control Policy Exhibit 10. The procedures prohibiting the use of copper or aluminum is located in Exhibit 10, Section V Page 11.*		
[192.605(b)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	**Satisfactory**
General Comment: *The O&M references Peoples Corrosion Control Policy Exhibit 10. The procedure is located in Exhibit 10, Section 1 Page 3.*		
[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	**Satisfactory**
General Comment:		

The O&M references Peoples Corrosion Control Policy Exhibit 10. The procedures for bare or unprotected pipelines is located in Exhibit 10, Section V Page 11 and 19.

[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	**Satisfactory**

General Comment:

The procedure requiring suitable coatings to prevent atmospheric corrosion is located in Exhibit 10, Section IV Page 6.

[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	**Satisfactory**

General Comment:

The procedure for pipeline inspection for Manlove storage is located in Exhibit 10, Section V Page 21.

[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	**Satisfactory**

General Comment:

The procedure for coatings is located in Exhibit 14, IV Page 6 which references the Corrosion Control Order 8.100.

[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	**Satisfactory**

General Comment:

The procedures for adequate cathodic protection and criteria is located in Exhibit 10, Section V D Page 15.

[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	**Satisfactory**

General Comment:

The procedures are located in Exhibit 10, Section V E Pages 16-17.

[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	**Satisfactory**

General Comment:

The procedures are located in Exhibit 10, Section V E Page 18.

[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per	**Satisfactory**

	year/15 months?	
General Comment: *There are no critical bonds in the storage field, the operator is monitoring non-critical bonds every three months as indicated in Exhibit 10, Section V Page 18.*		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	**Satisfactory**
General Comment: *The procedures for remedial measure indicated by monitoring are located in Exhibit 10 Corrosion Control Policy Section V, F Page 19.*		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	**Satisfactory**
General Comment: *The procedures requiring survey of unprotected pipelines are located in Exhibit 10, Section V Page 19.*		
[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	**Satisfactory**
General Comment: *The procedures for electrical isolation are located in Exhibit 10, Section V Pages 13-15.*		
[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	**Satisfactory**
General Comment: *The procedures for electrical isolation are located in Exhibit 10, Section V Pages 13-15.*		
[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	**Satisfactory**
General Comment: *The procedures for electrical isolation are located in Exhibit 10, Section V Pages 13-15.*		
[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	**Satisfactory**
General Comment: *The procedures for electrical isolation are located in Exhibit 10, Section V Pages 13-15.*		
[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical	**Satisfactory**

	measurement are established to determine the adequacy of cathodic protection?	
General Comment: *The procedures for the installation and maintenance of test leads are located in Exhibit 10, Section V B Pages 11-12.*		
[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	**Satisfactory**
General Comment: *The procedures for the installation and maintenance of test leads are located in Exhibit 10, Section V B Pages 11-12.*		
[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	**Satisfactory**
General Comment: *The procedures for interference currents are located in Exhibit 10, Section V F Page 20.*		
[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	**Satisfactory**
General Comment: *The procedures for interference currents are located in Exhibit 10, Section V F Page 20.*		
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	**Satisfactory**
General Comment: *The procedures for internal corrosion including addressing corrosive gas are located in Exhibit 10 VI Pages 21-22.*		
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	**Satisfactory**
General Comment: *The procedures for internal corrosion including addressing corrosive gas are located in Exhibit 10 VI Pages 21-22.*		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	**Satisfactory**
General Comment: *The procedures for internal corrosion including addressing corrosive gas are located in Exhibit 10, VI Pages 21-22.*		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement	**Satisfactory**

	of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192,489?	
General Comment: *The procedures for internal corrosion including addressing corrosive gas are located in Exhibit 10 VI Pages 21-22.*		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	**Satisfactory**
General Comment: *The procedures for internal corrosion including addressing corrosive gas are located in Exhibit 10 VI Pages 21-22.*		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	**Unsatisfactory**
NOA Comment: *The O&M does not contain design and construction requirements for addressing internal corrosion for new or replaced segments of transmission line pipe, valves, fittings or other components installed in the pipeline to reduce the risk of internal corrosion. Design requirements should be configured to reduce the liquid that is allowed to collect in the line, means for removing liquid and monitoring identified locations based upon the highest potential for internal corrosion.*		
[192.605(b)][192.476(c)]	Does the operator's procedure require an evaluation of the impact of internal corrosion to the downstream portion of the existing pipeline when a transmission pipeline configuration is changed to provide for removal of liquids and monitoring of internal corrosion as appropriate?	**Unsatisfactory**
NOA Comment: *The O&M does not contain procedures for evaluating the impact of internal corrosion when changes are made to existing transmission pipelines. The procedures should include mitigating risk to downstream transmission pipelines by providing for removal of liquids and monitoring gas quality to ensure a corrosive environment does not exist.*		
[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	**Satisfactory**
General Comment: *The procedures for internal corrosion including addressing corrosive gas are located in Exhibit 10, VI Pages 21-22.*		
[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	**Satisfactory**
General Comment: *The procedures for atmospheric corrosion control are located in Exhibit 10, VII Pages 22-23.*		
[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	**Satisfactory**
General Comment:		

The procedures for atmospheric corrosion control are located in Exhibit 10, VII Pages 22-23.

[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	**Satisfactory**

General Comment:

The procedures for atmospheric corrosion control are located in Exhibit 10, VII Pages 22-23.

[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	**Satisfactory**

General Comment:

The procedures for atmospheric corrosion control are located in Exhibit 10, VII Pages 22-23.

[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	**Satisfactory**

General Comment:

The procedures for atmospheric corrosion remedial measures are located in Exhibit 10, VII Pages 22-24.

[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	**Satisfactory**

General Comment:

The procedures for atmospheric corrosion remedial measures are located in Exhibit 10, VII Pages 22-24.

[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	**Satisfactory**

General Comment:

The procedures for atmospheric corrosion remedial measures are located in Exhibit 10, VII Pages 22-24.

[192.605(b)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	**Satisfactory**

General Comment:

The procedure requiring the use of B-31G to determine the remaining wall thickness is located in Exhibit 13, I Page 177 and Appendix 11 of this manual.

[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	**Not Checked**

General Comment:

Manlove gas storage does not contain distribution piping. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	**Not Checked**

General Comment:

Manlove gas storage does not contain distribution piping. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	**Not Checked**

General Comment:

Manlove gas storage does not contain cast or ductile iron pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	**Not Checked**

General Comment:

Manlove gas storage does not contain cast or ductile iron pipelines. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	**Satisfactory**

General Comment:

The procedures located in the Manlove O&M Exhibit 14, Section 2.3.2, F Pages 41-42 contains the requirements for corrosion control records. The procedure requires retention of protected piping, structures, maps, tests, surveys and inspections to be maintained for the life of the pipeline.

[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	**Satisfactory**

General Comment:

The procedures located in the Manlove O&M Exhibit 14, Section 2.3.2, F Pages 41-42 contains the requirements for corrosion control records. The procedure requires retention of protected piping, structures, maps, tests, surveys and inspections to be maintained for the life of the pipeline.

[192.605(b)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	**Satisfactory**

General Comment:

The procedures located in the Manlove O&M Exhibit 14, Section 2.3.2, F Pages 41-42 contains the requirements for corrosion control records. The procedure requires retention of protected piping, structures, maps, tests, surveys and inspections to be maintained for the life of the pipeline.

UPRATING PROCEDURES	**Status**

Category Comment:

Manlove O&M does not contain uprating procedures and does not have plans to uprate any part of the system. The distribution O&M review was completed at Tech Training on January 31, 2014 inspection # 2014-P-00033.

[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	**Not Checked**
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	**Not Checked**
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	**Not Checked**
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	**Not Checked**
TRAINING		**Status**

Category Comment:

The Training procedures are located in Exhibit 6, Pages 1-79 and the Manlove Field Disaster and Emergency Action Plan Section 1, Page 1.

[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	**Satisfactory**
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	**Satisfactory**
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	**Satisfactory**
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	**Satisfactory**
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	**Satisfactory**
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	**Satisfactory**
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the	**Not Applicable**

	IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	
General Comment: *Peoples Gas is a public utility.*		
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	**Satisfactory**

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.